

John V. Picone III, Bar No. 187226  
 jpicone@hopkinscarley.com  
 Jeffrey M. Ratinoff, Bar No. 197241  
 jratinoff@hopkinscarley.com  
 HOPKINS & CARLEY  
 A Law Corporation  
 The Letitia Building  
 70 South First Street  
 San Jose, CA 95113-2406  
*mailing address:*  
 P.O. Box 1469  
 San Jose, CA 95109-1469  
 Telephone: (408) 286-9800  
 Facsimile: (408) 998-4790

Attorneys for Plaintiffs and Counter-Defendants  
 NEO4J, INC. and NEO4J SWEDEN AB

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NEO4J, INC., a Delaware corporation, and  
 NEO4J SWEDEN, AB, a Swedish  
 corporation,

Plaintiffs,

v.

PURETHINK LLC, a Delaware limited  
 liability company, IGOV INC., a Virginia  
 corporation, and JOHN MARK SUHY, an  
 individual,

Defendants.

CASE NO. 5:18-cv-07182-EJD

**STIPULATION AND [PROPOSED]  
 ORDER FOR FURTHER MODIFICATION  
 OF PHASE 1 SUMMARY JUDGMENT  
 BRIEFING SCHEDULE**

AND RELATED COUNTERCLAIMS.

NEO4J, INC., a Delaware corporation, and  
 NEO4J SWEDEN AB, a Swedish  
 corporation,

Plaintiffs,

v.

GRAPH FOUNDATION, INC., an Ohio  
 corporation, GRAPHGRID, INC., an Ohio  
 corporation, and ATOMRAIN INC., a  
 Nevada corporation,

Defendants.

CASE NO. 5:19-cv-06226-EJD

**STIPULATION**

Plaintiff and Counter-Defendants Neo4j, Inc. and Neo4j Sweden AB (collectively “Plaintiffs”), Defendants and Counterclaimants PureThink LLC and iGov, Inc. and Defendant John Mark Suhy (collectively the “PureThink Defendants”) in the action entitled *Neo4j, Inc. et al v. PureThink LLC et al.* Case No. 5:18-cv-07182-EJD (“PT Action”) and Defendants Graph Foundation, Inc. (“GFI”), GraphGrid, Inc. and AtomRain Inc. in the related action entitled *Neo4j, Inc. v. Graph Foundation, Inc.*, Case No. 3:19-cv-06226-EJD (“GFI Action”), by and through the parties’ respective attorneys, hereby submit this stipulation as follows:

1. On September 10, 2020, the Court entered an order modifying the briefing schedule for the Phase 1 motions for summary judgment. PT Dkt. No. 87; GFI Dkt. No. 77. In that stipulation, the parties agreed that the last day for Plaintiffs to file their combined opposition/reply in the PureThink and GFI Actions would be February 15, 2021, which the parties did not recognize at that time was a Federal Court Holiday. *Id.*, ¶ 8. Pursuant to Federal Rule of Civil Procedure FRCP 6(a)(1)(C), Plaintiffs’ brief is actually due on February 16, 2021.

2. In the interest of caution and for clarity, the parties agreed to submit this stipulation confirming the deadline for Plaintiffs to file their combined opposition/reply in the PureThink and GFI Actions is February 16, 2021.

3. The parties further agree that the last day for Defendants to file their combined reply brief in the PureThink and GFI Action shall be moved from March 8, 2021 to March 9, 2021 to offset the foregoing adjustment.

Event	Current Date	Proposed Date
Last Day for Plaintiffs to file their combined opposition/reply in the PT Action and GFI Action	February 15, 2021	February 16, 2021
Last Day for Defendants to file their combined reply brief in the PT Action and GFI Action	March 8, 2021	March 9, 2021
Hearing on motions for summary judgment, partial summary judgment and/or summary adjudication and a further Case Management Conference to set the schedule for Phase 2 in the PT Action and GFI Action	April 15, 2021. <i>See</i> PT Dkt. No. 105; GFI Dkt. No. 104.	No Change.

1                   **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**

2  
3           Dated: February 1, 2021

HOPKINS & CARLEY  
A Law Corporation

4  
5                   By: /s/ Jeffrey M. Ratino  
6                               Jeffrey M. Ratino  
                              Attorneys for Plaintiffs NEO4J, INC. and  
                              NEO4J SWEDEN AB

7           Dated: February 1, 2021

8                               /s/ Adron W. Beene  
9                               Adron W. Beene  
10                              Attorneys for Defendants PURETHINK  
                                  LLC, IGOV INC., and JOHN MARK  
                                  SUHY

11          Dated: February 1, 2021

BERGESON, LLP

12                   By: /s/ John D. Pernick  
13                               John D. Pernick  
14                               Attorneys for Defendant  
                                  GRAPH FOUNDATION, INC.

15          Dated: February 1, 2021

SKAGGS FAUCETTE LLP

16                   By: /s/ Jeffrey E. Faucette  
17                               Jeffrey E. Faucette  
18                               Attorneys for Defendants GRAPHGRID,  
                                  INC. and ATOMRAIN INC.

19                   **IT IS SO ORDERED.**

20  
21          Dated: \_\_\_\_\_

22                               \_\_\_\_\_  
23                               EDWARD J. DAVILA  
24                               United States District Court Judge

**ATTESTATION OF E-FILED SIGNATURE**

Pursuant to Local Rule 5-1(i)(3), I hereby certify that I have obtained the concurrence in the filing of this document from all signatories for whom a signature is indicated by a “conformed” signature (/s/) within this electronically filed document and I have on file records to support this concurrence for subsequent production to the Court if so ordered or for inspection upon request.

Dated: February 1, 2021

HOPKINS & CARLEY  
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By: /s/ Jeffrey M. Ratinoff

John V. Picone III  
Jeffrey M. Ratinoff  
Attorneys for Plaintiffs and  
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